

## **REMARKS**

Claims 20-39 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

While Applicants maintain that Benitez is not prior art with respect to the present invention for at least the reasons established in the records; Applicants turn to the merits of the rejection:

Claims 20, 27 and 34 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Ortega (*Supporting Ranked Boolean Similarity Queries in MARS*) in view of Benitez (*MediaNet: A Multimedia Information Network for Knowledge Representation*). The Examiner stated essentially that the combined teachings of Ortega and Benitez teach or suggest all the limitations of Claims 20, 27 and 34.

Claims 20 and 27 claim, *inter alia*, “translating the high-level concept into a low-level query by using stored concept constructs which are defined using features derived from a plurality of application domains.” Claim 34 claims, *inter alia*, “a concept translation engine that receives a high-level concept describing data to be accessed, translates the high-level concept into a low-level query using stored concept constructs which are defined using features derived from a plurality of application domains.”

Ortega teaches a method for retrieval of multimedia objects using a Boolean retrieval model (see Abstract and page 4, line 1-2). Ortega does not teach or suggest “translating the high-level concept into a low-level query by using stored concept constructs which are defined using features derived from a plurality of application domains” as claimed in Claims 20 and 27,

and essentially as claimed in Claim 34. Ortega, as described in the instant application at page 20, lines 8-10, does not work with any constraints but simply provides Boolean conjunction and disjunction (see section 1.2, pages 3-5). That is, nowhere does Ortega teach or suggest stored concept constructs, as claimed in Claims 20, 27 and 34. Therefore, Ortega fails to teach or suggest all the limitations of Claims 20, 27 and 34.

Benitez teaches a content-based retrieval system using existing text annotations (see section 4.1, first paragraph). Benitez does not teach or suggest “translating the high-level concept into a low-level query by using stored concept constructs which are defined using features derived from a plurality of application domains” as claimed in Claims 20 and 27, and essentially as claimed in Claim 34. Benitez teaches concepts in section 1.3. Benitez does not teach or suggest concept constructs. For example, at most Benitez teaches relationships between concepts consisting of antonymy, hypernymy/hyponymy, meronymy/holonymy, entailment, and troponym. These relationships are not analogous to a construct, for example, see FIG 3, wherein the example of a ball and net is a construct which may be translated into a score. Nowhere does Benitez teach or suggest a concept construct, much less a translation using a concept construct (Benitez translation of text queries into visual data (see section 4.2, first paragraph) is from low-level text data to high-level image data). Therefore, Benitez fails to cure the deficiencies of Ortega.

The combined teachings of Ortega and Benitez teach a method for retrieval of multimedia objects using a Boolean retrieval using text annotations. The combined teachings of Ortega and Benitez fail to teach or suggest “translating the high-level concept into a low-level query by using stored concept constructs which are defined using features derived from a

plurality of application domains” as claimed in Claims 20 and 27, and essentially as claimed in Claim 34. Reconsideration of the rejection is respectfully requested.

Claims 21-26, 28-33 and 35-39 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Ortega in view of Benitez and further in view of Netsev (*CAMEL: Concept Annotated Image Libraries*). The Examiner stated essentially that the combined teachings of Ortega, Benitez and Netsev teach or suggest all the limitations of Claims 21-26, 28-33 and 35-39.

Claims 21-26 depend from Claim 20. Claims 28-33 depend from Claim 27. Claims 35-39 depend from Claim 34. The dependent claims are believed to be allowable for at least the reasons given for the respective independent claims. Reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including Claims 20-39, is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

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